

LAWYERS FOR CLEAN WATER, INC.  
Drevet Hunt (Bar No. 240487)  
Email: drev@lawyersforcleanwater.com  
1004-A O'Reilly Avenue  
San Francisco, California 94129  
Telephone: (415) 440-6520  
Facsimile: (415) 440-4155

*Attorneys for Plaintiff*  
LOS ANGELES WATERKEEPER

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

LOS ANGELES WATERKEEPER, a  
California non-profit corporation,

Plaintiff,

vs.

A AND A METAL RECYCLING, INC., a  
California corporation; SINDY CARDONA,  
an individual;

Defendants.

Civil Case No. 15-cv-04326 MWF-JEM

**REQUEST FOR ENTRY OF  
DEFAULT**

**(Federal Water Pollution Control Act,  
33 U.S.C. §§ 1251 *et seq.*)**

TO: THE CLERK OF THE ABOVE-ENTITLED COURT

Plaintiff Los Angeles Waterkeeper ("Waterkeeper" or "Plaintiff") hereby requests that the Clerk of the above-entitled court enter default in this matter against defendants A and A Metal Recycling, Inc. and Sindy Cardona (collectively "Defendants") on the ground that each Defendant has failed to appear or otherwise respond to the complaint within the time prescribed by the Federal Rules of Civil Procedure.

On June 8, 2015, Plaintiff filed a complaint against A and A Metal Recycling, Inc. and Sindy Cardona in the United States District Court, Central District of California. On July 17, 2015 Plaintiff served the summons and complaint on Defendants as evidenced by

1 the proof of services of summons on file with the court. *See* ECF Dkt. Nos. 10, 11.  
2 Defendants' responsive pleadings were due August 7, 2015. *See id.* Where as of the date  
3 of the filing of this request, Defendants have not responded to the complaint.

4 The above stated facts are set forth in the accompanying declaration of Drevet  
5 Hunt in Support of the Request for Entry, filed herewith.

6  
7 Dated: September 1, 2015

Respectfully submitted,  
LAWYERS FOR CLEAN WATER, INC.

8  
9  
10 /s/ Drevet Hunt  
11 Drevet Hunt  
12 Attorney for Plaintiff  
13 Los Angeles Waterkeeper  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28